

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MARY K. GARCIA,

Plaintiff,

v.

SYNCHRONY BANK d/b/a JCPENNY  
CREDIT SERVICES,

Defendant.

Case No. 3:17-cv-03226-M

Honorable Judge Barbara M. G. Lynn

**AGREED STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiff, MARY K. GARCIA, and the Defendant, SYNCHRONY BANK, improperly named as Synchrony Bank d/b/a JCPenney Credit Services, through their respective counsel that the above-captioned action is dismissed, without prejudice, pursuant to Federal Rule of Civil Procedure 41. Each party shall bear its own costs and attorney fees.

Dated: June 4, 2018

Respectfully Submitted,

**MARY K. GARCIA**

**SYNCHRONY BANK**

By: /s/ Nathan C. Volheim

By: /s/ Michael H. Bernick

Nathan C. Volheim  
*Counsel for Plaintiff*  
Sulaiman Law Group, LTD  
2500 S. Highland Avenue, Suite 200  
Lombard, Illinois 60148  
Phone: (630) 575-8181  
Fax : (630) 575-8188  
nvolheim@sulaimanlaw.com

Michael H. Bernick  
Federal ID No. 1439063  
State Bar No. 24078227  
REED SMITH LLP  
811 Main Street, Suite 1700  
Houston, Texas 77002  
Telephone: 713.469.3834  
Telecopier: 713.469.3899  
[mbernick@reedsmith.com](mailto:mbernick@reedsmith.com)

ATTORNEY IN-CHARGE FOR  
DEFENDANT SYNCHRONY BANK  
OF COUNSEL:

Jeffrey D. Parks  
State Bar No. 24076607  
DECKER JONES, P.C.  
801 Cherry Street, Unit #46  
Burnett Plaza, Suite 2000  
Fort Worth, Texas 76102-6836  
817.336.2400  
817.336.2181 (Fax)  
[JPARKS@DECKERJONES.COM](mailto:JPARKS@DECKERJONES.COM)  
*Attorney for Defendant Synchrony Bank*

**CERTIFICATE OF SERVICE**

I hereby certify I caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will be sent to all attorneys of record.

s/ Nathan C. Volheim  
Nathan C. Volheim